

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

IN RE:

ALLAN L. REAGAN,

Debtor

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CASE NO. 20-11161-tmd

CHAPTER 11

**DEBTOR'S LIMITED RESPONSE TO AMENDED MOTION OF
MERLE HAY INVESTORS, LLC'S LATE FILED PROOF OF CLAIM AS TIMELY**

TO THE HONORABLE TONY M. DAVIS, UNITED STATES BANKRUPTCY JUDGE:

Allan L. Reagan (the "**Debtor**") files this Response to Amended Motion of Merle Hay Investors, LLC to Late Filed Proof of Claim as Timely (the "Motion"), as follows:

1. Debtor does not oppose allowing Merle Hay Investors, LLC to have its Proof of Claim deemed timely filed.
2. Debtor reserves all rights to object to the Proof of Claim.

Respectfully submitted,

WALLER LANSDEN DORTCH & DAVIS, LLP

By: /s/ Mark C. Taylor

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ATTORNEY FOR DEBTOR

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served upon the parties on the attached service list electronically via the Court's ECF system on April 15, 2021, and to counsel listed below:

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/s/ Mark C. Taylor
Mark C. Taylor

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Trustee

Michael Colvard
Weston Center
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San Antonio, TX 78205

Twenty-largest creditors:

Madison/East Towne LLC
c/o CBL & Associates
2030 Hamilton Place Blvd.
Chattanooga, TN 37421-6000

Village @ La Orilla
Attn: Philip Lindborg
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Albuquerque, NM 87112

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Comerica Bank
Attn: Lesley B. Higginbotham, VP
Special Assets Group - Texas Market
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Dallas, TX 75265-0282

Ann E. Headley
1500 Knobb Hill Lane
Paoli, PA 19301

Wyndham Franchisor LLC
22 Sylvan Way
Parssipany, NJ 07054

Spain Family IX LLC
c/o Patrick J. Spain
11809 Oak Branch Dr.
Austin, TX 78737

Bennett Living Trust
Attn: Michael Bennett
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Venice, CA 90291

Gary J. Neumayer
2201 Berrywood Lane
Bloomington, IL 61704-2449

Headley Investments, LP
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Frances and Wayne Lee
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Monterey Park, CA 91754

Capital One Spark Visa for Business
P.O. Box 30285
Salt Lake City, UT 84130-0285

Chase Ink Card for Business
P.O. Box 15298
Wilmington, DE 19850-5298

Ford Motor Credit Corp.
P.O. Box 105704
Atlanta, GA 30348

Comerica Bank
Dept. #166901
P.O. Box 55000
Detroit, MI 48255-1669

Citicard Advantage Mastercard
Cardmember Services
P.O. Box 6062
Sioux Falls, SD 57117

Discover Card
Billing Inquiries
P.O. Box 30943
Salt Lake City, UT 84130

Chase Visa Mileage Plus
P.O. Box 15298
Wilmington, DE 19850-5298

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300 W. Sixth Street
Austin, TX 78701

**Unsecured Creditors/
Interested Parties**

3401Hoteliers, LP
Attn: Allan Reagan
2000 S. IH-35, Suite Q11
Round Rock, TX 78681

83rd Street Development, LLC
Attn: Trent G. Moore
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Oklahoma City, OK 73114

Action Propane
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Bank of Austin
Attn: David H. Marks, SVP
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DT Chandler, LLC
Attn: Bret Anderson, Manager
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Flix Brewhouse AZ, LLC
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